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*Co-Lead/Liaison Counsel for Plaintiffs*

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

In Re Bard IVC Filters Products Liability  
Litigation

No. MD-15-02641-PHX-DGC

DEBRA TINLIN and JAMES  
FRANCES TINLIN, a married couple,

Plaintiff,

v.

C.R. BARD, INC., a New Jersey  
corporation and BARD PERIPHERAL  
VASCULAR, an Arizona corporation,

Defendants.

**PLAINTIFFS' PROPOSED VERDICT  
FORM**

(Assigned to the Honorable David G.  
Campbell)

Plaintiffs hereby submit their proposed Verdict Form. A separate proposed Verdict Form for punitive damages follows this one.

We, the jury empaneled and sworn in the above action, upon our oaths, find as follows:

**A. LIABILITY**

1. Do you find by the greater weight of the evidence, to a reasonable certainty, that Bard is liable to Mrs. Tinlin on the strict liability design defect claim?

\_\_\_\_\_ Yes \_\_\_\_\_ No

2. Do you find by the greater weight of the evidence, to a reasonable certainty, that Bard is liable to Mrs. Tinlin on the negligent design defect claim?

\_\_\_\_\_ Yes \_\_\_\_\_ No

3. Do you find by the greater weight of the evidence, to a reasonable certainty, that Bard is liable to Mrs. Tinlin on the strict liability failure to warn claim?

\_\_\_\_\_ Yes \_\_\_\_\_ No

4. Do you find by the greater weight of the evidence, to a reasonable certainty, that Bard is liable to Mrs. Tinlin on the fraudulent concealment claim?

\_\_\_\_\_ Yes \_\_\_\_\_ No

5. Do you find by the greater weight of the evidence, to a reasonable certainty, that Bard is liable to Mrs. Tinlin on the negligent failure to warn claim?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If you answered “No” to each question in Part A, do not complete Parts B or C. If you answered “Yes” to any question in Part A, please complete Parts B and C.

**B. COMPENSATORY DAMAGES**

1. If you found Bard liable to Mrs. Tinlin on any of the claims set forth above, what amount of damages do you find will reasonably compensate Mrs. Tinlin for her injuries?

Answer: \$ \_\_\_\_\_

2. Do you find by the greater weight of the evidence, to a reasonable certainty, that Mr. Tinlin suffered a loss of consortium?

\_\_\_\_\_ Yes \_\_\_\_\_ No

3. If you answered "Yes" to Question B.2, then answer this question. Otherwise do not answer it. What amount of damages do you find will reasonably compensate Mr. Tinlin for his loss of consortium?

Answer: \$ \_\_\_\_\_

**C. PUNITIVE DAMAGES**

Do you find by clear, satisfactory, and convincing evidence, to a reasonable certainty, that punitive damages should be awarded against Bard?

\_\_\_\_\_ Yes \_\_\_\_\_ No

\_\_\_\_\_  
Presiding Juror Number

\_\_\_\_\_  
Date

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 corporation and BARD PERIPHERAL  
 VASCULAR, an Arizona corporation,

Defendants.

**PLAINTIFFS' PROPOSED VERDICT  
 FORM (PUNITIVE DAMAGES)**

(Assigned to the Honorable David G.  
 Campbell)

We, the jury empaneled and sworn in the above action, upon our oaths, find the  
 amount of punitive damages to be:

Answer: \$ \_\_\_\_\_

\_\_\_\_\_  
 Presiding Juror Number

\_\_\_\_\_  
 Date

1 RESPECTFULLY SUBMITTED this 6<sup>th</sup> day of May, 2019.

2 BEUS GILBERT PLLC

3 By: /s/ Mark S. O'Connor

4 Mark S. O'Connor  
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7 LOPEZ McHUGH LLP

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11 Newport Beach, California 92660

12 *Co-Lead/Liaison Counsel for Plaintiffs*

13 **CERTIFICATE OF SERVICE**

14 I hereby certify that on this 6<sup>th</sup> day of May, 2019, I electronically transmitted the  
15 attached document to the Clerk's Office using the CM/ECF System for filing and  
16 transmittal of a Notice of Electronic Filing.

17 /s/ Jessica Gallentine  
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